

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
RECEIVED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

JAN 23 2024

TONY R. MOORE, CLERK  
BY: *[Signature]*

WAYLON BAILEY

CIVIL DOCKET NO. 1:20-CV-01211

DEPUTY

VERSUS

JUDGE DAVID C. JOSEPH

RANDELL ILES, ET AL

MAGISTRATE JUDGE JOSEPH  
PEREZ-MONTES

**VERDICT FORM**

**Unreasonable Arrest and First Amendment Retaliation Claim**

**Question No. 1**

Do you find by a preponderance of the evidence that Defendant Randell Iles deprived Waylon Bailey of his constitutional rights by arresting him without probable cause?

YES  NO \_\_\_\_\_

*If you answered "yes" to Question No. 1, continue to Question No. 2. If you answered "no" to Question No. 1, you are done; please have the jury foreperson sign and date below and alert the CSO that you have reached a verdict.*

**Question No. 2**

Do you find by a preponderance of the evidence that this unreasonable arrest caused Waylon Bailey to suffer the injuries alleged?

YES  NO \_\_\_\_\_

*If you answered "yes" to Question No. 2, please continue to Question No. 3. If you answered "no" to Question No. 2, please continue to Question No. 8.*

**Question No. 3**

Do you find by a preponderance of the evidence that Defendant Officer Randell Iles's treatment of Waylon Bailey was substantially motivated by his Facebook post, and that the speech was not an incitement or a true threat?

YES  NO \_\_\_\_\_

*Please continue to Question No. 4.*

**Question No. 4**

Do you find, by a preponderance of the evidence, that Plaintiff Waylon Bailey has proven that Defendant Randell Iles is not entitled to qualified immunity?

YES ✓ NO \_\_\_\_\_

*If you answered "yes" to Question No. 4, please proceed to Question No. 5. If you answered "no," please continue to Question No. 8.*

**Question No. 5**

What amount do you find, if any, should be awarded for Plaintiff Waylon Bailey's compensatory damages for his unreasonable arrest and/or First Amendment retaliation claims?

\$ 200,000.

*Continue to Question No. 6.*

**Question No. 6**

Do you find by a preponderance of the evidence that, when Waylon Bailey posted on Facebook, Defendant Officer Randell Iles acted with malice or with reckless indifference to the rights of Waylon Bailey?

YES ✓ NO \_\_\_\_\_

*If you answered "yes" to Question No. 6, please proceed to Question No. 7. If you answered "no" to Question No. 6, continue to Question No. 8.*

**Question No. 7**

What amount of punitive damages, if any, should be awarded to Plaintiff against Defendant Officer Randell Iles?

\$ 5,000

**Louisiana False Arrest Claim**

**Question No. 8**

Do you find by a preponderance of the evidence that Defendant Randell Iles unlawfully detained Waylon Bailey under Louisiana State law?

YES ✓ NO \_\_\_\_\_

*If you answered "yes" to Question No. 8, please proceed to Question No. 9.*

*If you answered "no" to Question No. 8, you are done; please have the jury foreperson sign and date below and alert the CSO that you have reached a verdict.*

**Question No. 9**

What amount of the compensatory damages awarded in Question No. 5, do you find should be awarded for Plaintiff Waylon Bailey's claims under Louisiana state law against Sheriff Mark Wood under the theory of vicarious liability?

\$ 200,000

Please sign and date this form and notify the CSO that you have reached a verdict.

DATED this 23<sup>rd</sup> day of January 2024 at Alexandria, Louisiana.

